

**FILED**  
CHARLOTTE, N.C.

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

OCT 22 2009

U.S. DISTRICT COURT  
W. DIST. OF N.C.

UNITED STATES OF AMERICA

DOCKET NO. **3:09CR 203-C**

**BILL OF INDICTMENT**  
**UNDER SEAL**

v.

(1) ERIC GILES

18 U.S.C. § 371

(2) KEITH KRASZEWSKI

18 U.S.C. § 1956(a)(1)(A)(i)

(3) WILLIAM SKACH

18 U.S.C. § 1956(a)(1)(B)(ii)

18 U.S.C. § 1956(h)

21 U.S.C. § 846

21 U.S.C. § 841(b)(1)(B)

31 U.S.C. § 5324(a)(3)

**THE GRAND JURY CHARGES:**

At the specified times and at all relevant times:

**INTRODUCTORY PARAGRAPHS**

**I. RELEVANT ENTITIES AND PEOPLE**

1. From in or about 2006 to in or about 2009, Defendant ERIC GILES (GILES) operated and lead a drug trafficking organization based in the University area of Charlotte, North Carolina.
2. Defendant KEITH KRASZEWSKI (KRASZEWSKI) was a member of the drug trafficking organization and conducted and facilitated drug and drug-related financial transactions.
3. Defendant WILLIAM SKACH (SKACH) was a member of the drug trafficking organization and conducted and facilitated drug and drug-related financial transactions.
4. Norcal Athletics (NORCAL) is a nominee entity utilized by defendant GILES and others to operate the drug trafficking organization.
5. Pursuant to Title 31 U.S.C. § 5313(a) and Federal Regulation 31 C.F.R. § 103.22 (a)(1), a financial institution shall file a currency transaction report (CTR) of each exchange of currency or other payment which involves a transaction of more than \$10,000.

## **II. THE DRUG TRAFFICKING, MONEY LAUNDERING, and STRUCTURING SCHEME**

6. From in or about 2006 to in or about March 2009, defendants herein, and others known and unknown to the grand jury, operated a drug trafficking organization that imported high-grade marijuana from California to North Carolina. Although the drug trafficking organization was based in the University area of Charlotte, North Carolina it operated in various parts of Charlotte and North Carolina, including Asheville, Greenville and elsewhere.
7. It was a part of the conspiracy that defendant GILES and others traveled to California to purchase quantities of high-grade marijuana and to transport the high-grade marijuana to North Carolina using a variety of methods.
8. It was a part of the conspiracy that the defendants opened and maintained a series of bank accounts utilized to handle the financial transactions related to the drug trafficking organization. Such transactions included, among other things, the deposits of proceeds from sale of high-grade marijuana, withdrawals of proceeds for purchase of the high-grade marijuana and the distribution of proceeds from the drug trafficking organization.
9. It was further part of the conspiracy that defendant GILES opened and maintained the following bank accounts:

<b>No.</b>	<b>Date Opened</b>	<b>Financial Institution &amp; Location</b>	<b>Account Name/Number</b>	<b>Address</b>
a	02/20/07	5/3 Bank (f/k/a First Charter Bank), South Park Financial Center, Charlotte, NC	Eric Giles/XXXX5166	8417 River Birch Apt. #208, Charlotte, NC 28210
b	02/20/07	5/3 Bank (f/k/a First Charter Bank), South Park Financial Center, Charlotte, NC	Eric Giles d/b/a/ Norcal Athletics/XXXXX9415	8417 River Birch Apt. #208, Charlotte, NC 28210
c	04/25/08	Bank of America, Park Road Branch, Charlotte, NC	Eric Giles and S.B./XXX8771	229 Heritage Lake Dr., Apt. K, Charlotte, NC 28262

No.	Date Opened	Financial Institution & Location	Account Name/Number	Address
d	05/15/08	Bank of America, Santa Cruz, CA	Eric Giles/ XXXX7120	113 La Canada St., Santa Cruz, CA 95060
e	12/09/08	Bank of America, Eastfield Village, Charlotte NC	Norcal Atheletics /XXXXX1634	3621 Luton Ct., Charlotte, NC

10. It was further part of the conspiracy that defendant GILES instructed defendants KRASZEWSKI, SKACH and others to deposit proceeds of the high-grade marijuana sales and distributions into these bank accounts in amounts less than \$10,000 thereby concealing the activities of the drug trafficking organization.
11. It was further part of the conspiracy that defendants KRASZEWSKI, SKACH, and others regularly made consecutive-day and same-day deposits into these accounts in excess of \$10,000 but limited each single deposit to \$10,000 or less for the purpose of evading the filing of a CTR. The deposits were made up of, among other things, proceeds from the sale and distribution of high-grade marijuana.
12. It was further part of the conspiracy that defendant GILES and others known and unknown to the grand jury regularly made consecutive-day and same-day withdrawals from these accounts in excess of \$10,000 but limited each single withdrawal to \$10,000 or less for the purpose of evading the filing of a CTR. The purpose of the withdrawals was to, among other things, purchase high-grade marijuana in California and elsewhere.
13. It was further a part of the conspiracy that defendant GILES, KRASZEWSKI and SKACH utilized a variety of different methods to transport the high-grade marijuana from California to North Carolina including but not limited to the United States Postal Service (USPS).
14. It was a further part of the conspiracy that defendant GILES transmitted packages containing high-grade marijuana designating the sender as NORCAL on documents and forms submitted to the USPS.
15. It was a further part of the conspiracy that defendants GILES, KRASZEWSKI and others directed packages containing high-grade marijuana to nominee addresses under their control in North Carolina and thereafter defendants KRASZEWSKI, SKACH and others obtained the packages.
16. During the relevant time period, defendant GILES and others deposited a total of approximately \$1,017,800 into the relevant bank accounts describe above.

**COUNT ONE**

17. From in or about 2006 to in or about March 2009, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, defendants,

**(1) ERIC GILES,  
(2) KEITH KRASZEWSKI, and  
(3) WILLIAM SKACH,**

did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). Said offense involved 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B).

**COUNT TWO**

18. Paragraphs one through sixteen of the Introduction to this Bill of Indictment are hereby re-alleged and incorporated by reference into Count Two. From in or about 2007 to in or about 2009, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendants

**(1) ERIC GILES,  
(2) KEITH KRASZEWSKI, and  
(3) WILLIAM SKACH**

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

- a. to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute marijuana, a Schedule I controlled substance, with the intent to promote the carrying on of specified unlawful activity, that is conspiracy to distribute marijuana, a Schedule I controlled substance, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

- b. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute marijuana, a Schedule I controlled substance, knowing that the transaction was designed in whole and in part to avoid a transaction reporting requirement under federal law, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

All in violation of Title 18, United States Code, Section 1956(h).

**COUNT THREE**

19. Paragraphs one through sixteen of the Introduction to this Bill of Indictment are hereby re-alleged and incorporated by reference into Count Three.
20. From in or about April 2008, and continuing until in or about December 2008, in the Western District of North Carolina and elsewhere, the defendants,

**(1) ERIC GILES,  
(2) KEITH KRASZEWSKI, and  
(3) WILLIAM SKACH**

knowingly, intentionally, and unlawfully conspired and agreed with one another and others known and unknown to the grand jury, to violate Title 31, United States Code Section 5324(a)(3), by agreeing to structure, or assist in structuring a currency transaction for purpose of evading the reporting requirements of Title 31 United States Code Section 5313(a) and Title 31, Code of Federal Regulations, Section 103.22 with one or more domestic financial institutions.

**OVERT ACTS**

21. In furtherance of the conspiracy, and to effect its objectives, the following overt acts were committed in the Western District of North Carolina and elsewhere:
- a. Proceeds of the high-grade marijuana sales and distributions were deposited in increments of \$10,000 or less into a Bank of America account opened and maintained in the name of Eric Giles, bearing account number XXXXXX7120:

No.	Deposit Date	Time	Deposit Amount	Branch Name and Location
1	6/27/2008	18:00	\$3,600.00	Northcross, Davidson, NC
2	6/27/2008	17:34	\$8,000.00	Cornelius, Cornelius, NC

No.	Deposit Date	Time	Deposit Amount	Branch Name and Location
3	7/16/2008	16:30	\$4,000.00	University City, Charlotte, NC
4	7/17/2008	15:04	\$7,000.00	Hendersonville, Hendersonville, NC
5	7/25/2008	12:46	\$2,600.00	University City, Charlotte, NC
6	7/25/2008	15:29	\$4,000.00	Columbus, Columbus, NC
7	7/25/2008	12:13	\$7,000.00	Southpark, Charlotte, NC
8	7/31/2008	13:20	\$5,800.00	Cotswold, Charlotte, NC
9	7/31/2008	13:14	\$7,000.00	Starmount, Charlotte, NC
10	7/31/2008	13:01	\$7,200.00	Myers Park, Charlotte, NC
11	8/1/2008	18:06	\$1,100.00	University City, Charlotte, NC
12	8/1/2008	15:01	\$4,940.00	Prosperity Pointe, Charlotte, NC
13	8/1/2008	14:40	\$5,000.00	University City, Charlotte, NC
14	8/11/2008	15:20	\$5,500.00	Southpark, Charlotte, NC
15	8/11/2008	14:11	\$5,500.00	North Asheville, Asheville, NC
16	8/12/2008	15:26	\$6,000.00	Skyland, Asheville, NC
17	8/15/2008	13:46	\$3,685.00	Biltmore Village, Asheville, NC
18	8/15/2008	13:27	\$6,000.00	Skyland, Asheville, NC
19	8/19/2008	12:36	\$5,000.00	Myers Park, Charlotte, NC
20	8/19/2008	11:29	\$5,000.00	Southpark, Charlotte, NC
21	8/19/2008	12:47	\$6,000.00	Carolina Place, Charlotte, NC
22	8/19/2008	15:00	\$6,225.00	North Asheville, Asheville, NC
23	8/20/2008	16:55	\$1,200.00	North Asheville, Asheville, NC
24	8/20/2008	16:12	\$1,300.00	Signal Hill, Statesville, NC
25	8/20/2008	16:26	\$9,100.00	Starmount, Charlotte, NC
26	8/26/2008	13:45	\$1,300.00	Belmont, Belmont, NC
27	8/27/2008	13:40	\$9,000.00	Greenville Main, Greenville, NC
28	9/2/2008	17:07	\$2,000.00	Muir's Chapel Road, Greensboro, NC
29	9/2/2008	12:56	\$5,220.00	Southpark, Charlotte, NC
30	9/2/2008	12:15	\$8,000.00	Greenville Main, Greenville, NC
31	9/3/2008	unknown	\$9,000.00	East End, Greenville, NC
32	9/8/2008	16:31	\$3,000.00	Prosperity Pointe, Charlotte, NC
33	9/8/2008	16:13	\$8,000.00	University City, Charlotte, NC
34	9/9/2008	13:45	\$5,330.00	Southpark, Charlotte, NC
35	9/9/2008	13:32	\$8,000.00	Greenville Main, Greenville, NC
36	9/10/2008	16:46	\$2,000.00	University City, Charlotte, NC
37	9/11/2008	17:08	\$3,100.00	East Boynton, Boynton Beach, FL
38	9/11/2008	16:48	\$9,000.00	Boynton Plaza, Boynton Beach, FL
39	9/11/2008	unknown	\$9,600.00	Southpark, Charlotte, NC
40	9/16/2008	12:00	\$9,600.00	East End, Greenville, NC
41	9/17/2008	unknown	\$4,800.00	Unknown

No.	Deposit Date	Time	Deposit Amount	Branch Name and Location
42	9/18/2008	16:00	\$1,750.00	Downtown, Ft. Lauderdale, FL
43	9/18/2008	13:47	\$7,050.00	Downtown, Ft. Lauderdale, FL
44	9/18/2008	9:29	\$9,500.00	Greenville Main, Greenville, NC
45	9/22/2008	unknown	\$9,990.00	Eastfield Village, Charlotte, NC
46	9/23/2008	11:32	\$7,250.00	Starmount, Charlotte, NC
47	9/23/2008	13:33	\$8,000.00	Greenville Main, Greenville, NC
48	9/24/2008	13:46	\$9,800.00	Friendly Center, Greensboro, NC
49	9/26/2008	14:50	\$3,000.00	University City, Charlotte, NC
50	9/26/2008	unknown	\$4,000.00	Eastfield Village, Charlotte, NC
51	9/26/2008	13:55	\$5,000.00	Downtown, Ft. Lauderdale, FL
52	9/29/2008	16:59	\$9,010.00	Greenville Main, Greenville, NC
53	10/16/2008	16:58	\$4,700.00	University City, Charlotte, NC
54	10/16/2008	12:48	\$6,000.00	Southpark, Charlotte, NC
55	10/16/2008	12:36	\$7,700.00	Greenville Main, Greenville, NC
56	10/17/2008	12:25	\$8,000.00	Hospital, Greenville, NC
57	10/17/2008	14:53	\$9,100.00	University City, Charlotte, NC
58	10/17/2008	16:41	\$ 9,280.00	University City, Charlotte, NC
59	10/17/2008	15:23	\$ 9,500.00	Eastfield Village, Charlotte, NC
60	11/10/2008	unknown	\$5,900.00	Port Everglades, Ft. Lauderdale, FL
61	11/10/2008	11:43	\$6,900.00	East Sunrise Blvd, Ft. Lauderdale, FL
62	11/13/2008	16:54	\$1,100.00	University City, Charlotte, NC
63	11/13/2008	15:12	\$7,500.00	Eastfield Village, Charlotte, NC
64	11/14/2008	17:45	\$3,250.00	University City, Charlotte, NC
65	11/14/2008	unknown	\$8,600.00	Village Square, Boynton Beach, FL
66	11/14/2008	12:53	\$8,670.00	Hospital, Greenville, NC
67	11/17/2008	12:26	\$8,100.00	Greenville Main, Greenville, NC
68	11/17/2008	13:56	\$9,000.00	Southpark, Charlotte, NC
69	11/17/2008	15:22	\$9,000.00	Eastfield Village, Charlotte, NC
70	11/18/2008	14:54	\$6,780.00	University City, Charlotte, NC
71	11/20/2008	10:36	\$9,000.00	Starmount, Charlotte, NC
72	11/21/2008	14:02	\$4,460.00	University City, Charlotte, NC
73	11/26/2008	15:21	\$8,600.00	Mint Hill, Charlotte, NC
74	11/26/2008	15:18	\$8,900.00	Boynton Plaza, Boynton Beach, FL
75	12/4/2008	14:49	\$9,000.00	Eastfield Village, Charlotte, NC
76	12/8/2008	10:56	\$9,000.00	Danbury Central, Danbury, CT
<b>TOTAL</b>			<b>\$477,090</b>	

- b. Proceeds from the high-grade marijuana sales and distribution were withdrawn in increments of less than \$10,000 from a Bank of America account opened and

maintained in the name of Eric Giles, bearing account number XXXXXX7120 for the purpose of, among other things, the purchase of high-grade marijuana for distribution in North Carolina and elsewhere.

No.	Date	Withdrawal Amount	Branch Name and Location
1	5/15/2008	\$8,400.00	Scotts Valley, Scotts Valley, CA
2	5/16/2008	\$8,000.00	Watsonville Main, Watsonville, CA
3	6/30/2008	\$2,900.00	Santa Cruz Main, Santa Cruz, CA
4	6/30/2008	\$4,600.00	41st and Capitola, Capitola, CA
5	6/30/2008	\$8,000.00	Santa Cruz Main, Santa Cruz, CA
6	7/18/2008	\$5,800.00	41st and Capitola, Capitola, CA
7	7/18/2008	\$8,000.00	Santa Cruz Main, Santa Cruz, CA
8	7/21/2008	\$8,000.00	Santa Cruz Main, Santa Cruz, CA
9	7/24/2008	\$2,800.00	41st and Capitola, Capitola, CA
10	7/24/2008	\$6,000.00	Santa Cruz Main, Santa Cruz, CA
11	7/25/2008	\$6,000.00	41st and Capitola, Capitola, CA
12	7/25/2008	\$8,000.00	Santa Cruz Main, Santa Cruz, CA
13	7/30/2008	\$4,000.00	Santa Cruz Main, Santa Cruz, CA
14	7/30/2008	\$8,000.00	Scotts Valley, Scotts Valley, CA
15	7/31/2008	\$9,700.00	Scotts Valley, Scotts Valley, CA
16	7/31/2008	\$9,800.00	41st and Capitola, Capitola, CA
17	8/1/2008	\$5,000.00	Santa Cruz Main, Santa Cruz, CA
18	8/1/2008	\$9,600.00	41st and Capitola, Capitola, CA
19	8/11/2008	\$3,000.00	Eastfield Village, Charlotte, NC
20	8/11/2008	\$8,000.00	Prosperity Pointe, Charlotte, NC
21	8/15/2008	\$2,000.00	Santa Cruz Main, Santa Cruz, CA
22	8/15/2008	\$4,000.00	Scotts Valley, Scotts Valley, CA
23	8/15/2008	\$8,000.00	41st and Capitola, Capitola, CA
24	8/19/2008	\$9,500.00	41st and Capitola, Capitola, CA
25	8/19/2008	\$9,500.00	Santa Cruz Main, Santa Cruz, CA
26	8/20/2008	\$5,000.00	41st and Capitola, Capitola, CA
27	8/20/2008	\$9,500.00	Scotts Valley, Scotts Valley, CA
28	9/2/2008	\$8,000.00	Newport Center, Newport Beach, CA
29	9/3/2008	\$7,000.00	41st and Capitola, Capitola, CA
30	9/3/2008	\$9,000.00	Valley Fair, San Jose, CA
31	9/4/2008	\$7,000.00	Santa Cruz Main, Santa Cruz, CA
32	9/8/2008	\$9,000.00	Newport Beach, Newport Beach, CA
33	9/9/2008	\$9,000.00	Valley Fair, San Jose, CA
34	9/10/2008	\$8,000.00	Santa Cruz Main, Santa Cruz, CA
35	9/11/2008	\$9,000.00	Santa Cruz Main, Santa Cruz, CA



No.	Date	Withdrawal Amount	Branch Name and Location
36	9/11/2008	\$9,500.00	Eastridge Center, San Jose, CA
37	9/16/2008	\$9,600.00	Eastfield Village, Charlotte, NC
38	9/18/2008	\$9,800.00	Santa Cruz Main, Santa Cruz, CA
39	9/18/2008	\$9,800.00	Valley Fair, San Jose, CA
40	9/24/2008	\$9,800.00	Valley Fair, San Jose, CA
41	9/24/2008	\$9,800.00	41st and Capitola, Capitola, CA
42	9/25/2008	\$9,800.00	Santa Cruz Main, Santa Cruz, CA
43	9/26/2008	\$4,600.00	Valley Fair, San Jose, CA
44	9/26/2008	\$9,800.00	Eastridge Center, San Jose, CA
45	9/29/2008	\$7,000.00	Prosperity Pointe, Charlotte, NC
46	10/15/2008	\$7,000.00	41st and Capitola, Capitola, CA
47	10/15/2008	\$7,300.00	Santa Cruz Main, Santa Cruz, CA
48	10/16/2008	\$8,000.00	41st and Capitola, Capitola, CA
49	10/16/2008	\$9,000.00	Santa Cruz Main, Santa Cruz, CA
50	10/17/2008	\$8,100.00	41st and Capitola, Capitola, CA
51	10/17/2008	\$9,000.00	Scotts Valley, Scotts Valley, CA
52	10/17/2008	\$9,600.00	Valley Fair, San Jose, CA
53	10/20/2008	\$6,600.00	Santa Cruz Main, Santa Cruz, CA
54	11/10/2008	\$9,000.00	San Bruno, San Bruno, CA
55	11/12/2008	\$3,000.00	Valley Fair, San Jose, CA
56	11/13/2008	\$5,000.00	41st and Capitola, Capitola, CA
57	11/13/2008	\$7,500.00	Santa Cruz Main, Santa Cruz, CA
58	11/14/2008	\$9,100.00	Santa Cruz Main, Santa Cruz, CA
59	11/17/2008	\$5,000.00	One Powell, San Francisco, CA
60	11/17/2008	\$7,000.00	Scotts Valley, Scotts Valley, CA
61	11/17/2008	\$9,000.00	41st and Capitola, Capitola, CA
62	11/17/2008	\$9,000.00	Vallco Park, Cupertino, CA
63	11/18/2008	\$7,000.00	Santa Cruz Main, Santa Cruz, CA
64	11/19/2008	\$6,000.00	Scotts Valley, Scotts Valley, CA
65	11/28/2008	\$7,000.00	Aliso Viejo, Aliso Viejo CA
66	12/1/2008	\$ 8,000.00	Westchester, Los Angeles, CA
67	12/3/2008	\$5,000.00	Santa Cruz Main, Santa Cruz, CA
68	12/3/2008	\$ 8,000.00	Valley Fair, San Jose, CA
<b>TOTAL</b>		<b>\$505,800</b>	

- c. Proceeds of the high-grade marijuana sales and distributions were deposited in increments of less than \$10,000 into a Bank of America account opened and maintained in the name of Eric Giles and S.B., bearing account number XXXXXX8771:

No.	Deposit Date	Time	Deposit Amount	Branch Name and Location
1	4/28/2008	11:19	\$9,000.00	University City, Charlotte, NC
2	4/28/2008	10:57	\$9,250.00	Prosperity Pointe, Charlotte, NC
3	4/29/2008	14:59	\$9,000.00	University City, Charlotte, NC
4	4/29/2008	15:17	\$8,800.00	Prosperity Pointe, Charlotte, NC
5	5/2/2008	16:51	\$1,500.00	University City, Charlotte, NC
6	5/2/2008	15:18	\$9,500.00	Prosperity Pointe, Charlotte, NC
7	5/2/2008	14:55	\$9,500.00	University City, Charlotte, NC
8	5/14/2008	14:39	\$9,400.00	University City, Charlotte, NC
9	5/15/2008	13:08	\$8,750.00	University City, Charlotte, NC
10	5/16/2008	14:39	\$9,000.00	University City, Charlotte, NC
11	5/16/2008	14:23	\$8,500.00	Prosperity Pointe, Charlotte, NC
12	5/16/2008	16:52	\$3,500.00	Coddle Creek Village, Concord, NC
13	5/19/2008	13:04	\$8,500.00	Prosperity Pointe, Charlotte, NC
14	5/19/2008	13:25	\$8,980.00	University City, Charlotte, NC
15	5/29/2008	16:40	\$2,000.00	University City, Charlotte, NC
16	5/29/2008	13:20	\$8,800.00	Prosperity Pointe, Charlotte, NC
17	5/29/2008	13:40	\$9,000.00	University City, Charlotte, NC
18	6/2/2008	13:16	\$9,500.00	Prosperity Pointe, Charlotte, NC
19	6/2/2008	13:36	\$9,500.00	University City, Charlotte, NC
20	6/3/2008	16:59	\$9,500.00	University City, Charlotte, NC
21	6/4/2008	15:46	\$7,340.00	Prosperity Pointe, Charlotte, NC
22	6/4/2008	17:02	\$3,100.00	Northcross, Davidson, NC
23	6/4/2008	11:45	\$9,500.00	University City, Charlotte, NC
24	6/6/2008	unknown	\$9,300.00	Unknown
25	6/6/2008	unknown	\$1,250.00	Unknown
26	6/9/2008	unknown	\$9,200.00	Unknown
27	7/5/2008	11:11	\$8,650.00	University City, Charlotte, NC
<b>TOTAL</b>			<b>\$209,820</b>	

- d. Proceeds from the high-grade marijuana sales and distribution were withdrawn in increments of \$10,000 or less from a Bank of America account opened and maintained in the name of Eric Giles and S.B., bearing account number XXXXXX8771 for the purpose of, among other things, the purchase of high-grade marijuana for distribution in North Carolina and elsewhere.:

No.	Date	Withdrawal Amount	Branch Name and Location
1	4/28/2008	\$9,093.00	Hester, San Jose, CA
2	4/28/2008	\$9,100.00	Hester, San Jose, CA

No.	Date	Withdrawal Amount	Branch Name and Location
3	4/29/2008	\$8,900.00	41st and Capitola, Capitola, CA
4	4/30/2008	\$8,900.00	Unknown
5	5/1/2008	\$3,990.00	Santa Cruz Main, Santa Cruz, CA
6	5/2/2008	\$1,500.00	Santa Cruz Main, Santa Cruz, CA
7	5/2/2008	\$9,500.00	41st and Capitola, Capitola, CA
8	5/2/2008	\$9,500.00	Santa Cruz Main, Santa Cruz, CA
9	5/15/2008	\$9,600.00	Santa Cruz Main, Santa Cruz, CA
10	5/16/2008	\$3,500.00	Scotts Valley, Scotts Valley, CA
11	5/16/2008	\$9,500.00	41st and Capitola, Capitola, CA
12	5/19/2008	\$8,500.00	Mandarin Towers, San Francisco, CA
13	5/19/2008	\$9,000.00	Chinatown, , San Francisco, CA
14	5/29/2008	\$3,700.00	Scotts Valley, Scotts Valley, CA
15	5/29/2008	\$5,000.00	Santa Cruz Main, Santa Cruz, CA
16	5/29/2008	\$9,000.00	41st and Capitola, Capitola, CA
17	6/2/2008	\$600.00	41st and Capitola, Capitola, CA
18	6/2/2008	\$4,950.00	Santa Cruz Main, Santa Cruz, CA
19	6/2/2008	\$8,000.00	Scotts Valley, Scotts Valley, CA
20	6/2/2008	\$9,000.00	41st and Capitola, Capitola, CA
21	6/3/2008	\$9,500.00	Valley Fair, San Jose, CA
22	6/4/2008	\$3,990.00	The Pruneyard, Campbell, CA
23	6/4/2008	\$8,000.00	Scotts Valley, Scotts Valley, CA
24	6/4/2008	\$8,000.00	Valley Fair, San Jose, CA
25	6/6/2008	\$3,500.00	Scotts Valley, Scotts Valley, CA
26	6/6/2008	\$8,000.00	41st and Capitola, Capitola, CA
27	6/9/2008	\$9,200.00	Santa Cruz Main, Santa Cruz, CA
	<b>TOTAL</b>	<b>\$191,023</b>	

All in violation of Title 18, United States Code, Section 371 and Title 31 United States Code Section 5324(a)(3).

## NOTICE OF FORFEITURE

Notice is hereby given of the provisions of 18 U.S.C. §982, 21 U.S.C. §853, 31 U.S.C. §5317(c), and 28 U.S.C. §2461(c). Under §2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. §981, 21 U.S.C. § 881, and all specified unlawful activities listed or referenced in 18 U.S.C. §1956(c)(7), which are incorporated as to proceeds by §981(a)(1)(C). The defendant has or had a possessory or legal interest in the following property that is subject to forfeiture in accordance with the foregoing statutes:

(a) all property involved in the violations alleged in this bill of indictment;

(b) all property which is proceeds of such violations;

(c) all property used or intended to be used, in any manner or part, to commit or facilitate the commission of such violations; and,

(d) in the event that any property described in (a) - (c) cannot be located or recovered or has been substantially diminished in value or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant, to the extent of the value of the property described in (a) - (c).

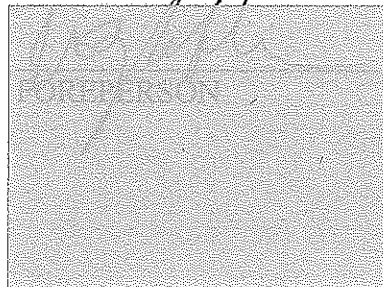
The grand jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

All currency and monetary instruments which were received during, involved in or used or intended to be used to facilitate the crimes alleged in this bill of indictment, including but not limited to the following:

a. the sum of approximately \$1,017,800 in proceeds of the drug conspiracy and property involved in the money laundering conspiracy;

b. the sum of approximately \$686,910 in structured deposits and the sum of approximately \$696,823 in structured withdrawals;

A TRUE BILL, /



EDWARD R. RYAN  
UNITED STATES ATTORNEY

  
KELLI H. FERRY

ASSISTANT UNITED STATES ATTORNEY

  
MARK T. ODULIO

ASSISTANT UNITED STATES ATTORNEY